

**FILED**  
10/16/2021

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT  
MAGISTRATE JUDGE WEISMAN

UNITED STATES OF AMERICA

v.

ROBERT NARUP

Case Number: 21 CR 644

M. David Weisman  
Magistrate Judge

UNDER SEAL

JJ

**GOVERNMENT'S MOTION TO SEAL  
CRIMINAL COMPLAINT AND AFFIDAVIT**

Now comes the UNITED STATES OF AMERICA, by JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, and states as follows in support of its Motion to Seal the Criminal Complaint and supporting Affidavit:

On the 16th day of October, 2021, the government applied for a Criminal Complaint in this matter, and submitted an Affidavit in support. The government anticipates that the defendant will make his initial appearance on October 19, 2021 in the Eastern District of Missouri—the district of the defendant's arrest. The supporting Affidavit contains information that is not publicly known and is part of an ongoing investigation. Public dissemination of that information at this point could impact the government's covert investigation.

For the foregoing reasons, the government respectfully requests that the Criminal Complaint and supporting Affidavit be sealed until the defendant makes his initial appearance in the Eastern District of Missouri on October 19, 2021. The government will advise the Court when the defendant has made his initial appearance, at which time this matter may be unsealed.

Respectfully submitted,

JOHN R. LAUSCH, JR.  
United States Attorney

By: /s/ Jared Hasten  
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DATE: October 16, 2021